Deepwater Horizon Response Unified Area Command
Louisiana Transition Plan

APPROVED:

FOSC	Date
BP	Date
TOI	Date
BOEM	Date
LA SOSC	Date

Deepwater Horizon Response Unified Area Command Louisiana Transition Plan

In accordance with the National Contingency Plan, the Coast Guard, BP and State of Louisiana, taking care to include input from the Parishes, will work together as a Unified Command to carry out the Branch/Parish Transition Plans executed among the Coast Guard, BP and parishes.

Overall Condition: **Maintain immediate all zone response capability until Permanent Well Kill is completed.** Resource readiness will be maintained to respond to resumption of oil flow into the Gulf of Mexico. Once Permanent Well Kill is declared, all changes will be based upon the location and quantity of Deepwater Horizon oil in the environment – offshore, nearshore, subsurface and onshore. A sub-sea sampling plan is in effect, gathering sediment and water column sampling data in the offshore and nearshore environments including a fleet of oceanographic research vessels in the offshore domain, and an array of oil snare traps in the nearshore domain.

Personnel and Vessels of Opportunity will be adjusted based on Branch/Parish Transition Plans. Contracts are in place for the immediate and tiered increase of capability.

A robust, rapid response capability shall be maintained throughout hurricane season to respond to new oiling from all sources including, and not limited to MC 252 oil. It is envisioned that a State of Emergency would be declared triggering the Stafford Act coincident with a hurricane. Under this contingency, oil spill response operations would be conducted in accordance with Emergency Support Function 10 under the Stafford Act, drawing upon the resources allocated to the Deepwater Horizon response, as necessary. Expedited oil sampling protocols shall be integrated into the response to make a responsible party determination for payment or reimbursement under the Clean Water Act/Oil Pollution Act of 1990. These sampling protocols shall in no way impede a rapid oil spill response and removal posture.

Purpose: Carry out Branch/Parish Transition Plans describing a tailored response to efficiently and effectively meet response needs as well as transition to long-term recovery. These plans promote consistency across the command structure and adjust to operational demands while completing the following:

- Maintain a Common Operational Picture (COP) across all ICP's and Branches to support a unified and coordinated response.
- A complete copy of all directives being sent from either BP or United States Coast Guard higher authority to the branch level directors is provided to the parish designated representative prior to implementation.
- Carry out a tiered approach to resource allocation, redeployment, and demobilization

- Use the MC-252 well status, the location/amount of free oil in the environment – offshore, nearshore, subsurface and onshore and shoreline conditions as key drivers. Based on:
    - SCAT data
    - Geospatial & Aerial observations of oil amount and distribution
    - On-water and shoreline recovery data
    - NOAA assessment & projections
    - Hurricane season
    - State and federal commission of scientific experts develop and implement protocols for the detection, monitoring, and mediation of submerged oil.

- Coordinate all activities related to this transition plan among the NIC, UAC, and ICPs including the Parish Presidents or their designated representative.
- Establish guidelines for scaling or repositioning people, contractors, equipment, and supplies to meet the needs of the incident.
- Implement directives from the parish severe weather contingency plan as integral components of each level of response operations.

Consultation between the Federal On Scene Coordinator (FOSC) and parish presidents, policy jury presidents or their designees as described in this document and the Branch/Parish Transition Plans regarding change in levels or removal of assets shall consist of discussions between the FOSC and the parish president, policy jury president or their designee. All changes in levels described in this plan and the Branch/Parish Transition Plan shall consist of such consultation.

Shoreline Cleanup Principles: Shoreline cleanup can generally be identified into 3 stages:

1. Clean-up: personnel are onsite daily
2. Monitor and React: Personnel are onsite every few days tending to deployed equipment (boom or other protective measures) or conducting limited cleanup. Hot-shot teams[1] will be deployed as needed to respond to new reports of oiling
3. Natural Attenuation: All equipment removed and periodic site monitoring; may not be at clean-up end points.

Guiding Principles:

- Levels may revert based upon reoccurrence of conditions identified at any previous matrix.
- Be prepared to respond to all contingencies including weather and changing conditions and events.
- Maintain continuous and effective communications to sustain parish, state, and other stakeholder support.

[1] Hot-shot teams: Quick response teams available to respond to reports of new oiling, provide initial verification of report, and conduct clean-up and sampling as appropriate.

- Maintain efficiency and minimize waste through a well planned response with a clear concept of operation (COP).
- VOOs/local fishing fleet will be given priority to be retained over contracted OSROs in the de-mobilization of assets. VOOs/local fishing fleet shall be employed to maintain, remove and re-deploy all boom or other protective measures, support fish sampling efforts, and handle on water logistics as necessary.
- The unique conditions associated with hurricane season will likely require a heightened protection, response and removal capabilities.

Action:

1. Incident Commanders and branches shall carry out Branch/Parish Transition Plans and consider the following guidelines:
    - Recall times and estimated time to be on-scene shall be identified for all critical resources not currently in operational use.
    - UAC will assist with providing the identified measures to the ICP at each response level.
    - The UAC will notify all ICs and branches when the permanent well kill is complete and resources may be adjusted to meet strategic and operational objectives.
    - ICs shall report the current Response Level to the UAC Situation Unit daily; response levels should be further delineated for each Branch level.
    - In consultation with each respective Parish and consistent with Branch/Parish Transition Plans, branches may adjust the response structure as changes in operations and response levels dictate.
    - In consultation with each respective Parish and consistent with Branch/Parish Transition Plans, branches shall identify critical resource requirements to support ongoing operations, and identify excess capacity prior to de-mobilization of personnel and assets.
2. Unified Area Command Staff and Section Chiefs and the Aviation Coordination Command, in coordination with the UAC Remote Sensing Coordinator, shall develop annexes consistent with the guidance of this plan and Branch/Parish Transition Plans, as applicable.
3. No changes in Response Levels will be executed without consultation with the parish.
4. Create a detail demobilization plan of the VOO's to include a joint inspection of these vessels to determine if there are any damages that were a direct result of their response effort. A process must also be created to immediately create a claim for said damages
5. Create a mutually agreed upon definition of when a shoreline is to be classified as "no further treatment."
6. Create a detailed monitoring plan (including offshore, nearshore, subsurface and onshore) that will address the following concerns:
    a. What long-term monitoring will be conducted
    b. The frequency of the monitoring
    c. Who will conduct the monitoring

d. A map of the sampling points
e. The sampling method
f. The parameters of the sampling and tests
g. Access to the test results
h. The term of the monitoring period
i. How monitoring will transition from the oil removal incident organization to the NRDA organization.

Level I: All Zone Response

Status: Well cap in place no new Deepwater Horizon product discharging into the Gulf of Mexico. Recoverable oil in the water in the offshore and nearshore (all state jurisdictional waters) environment and impacting the shoreline.

ACTIVITIES:

- SCAT Shoreline Assessment conducted under Stage I and II Nearshore and Shoreline Response Plan
- Continue air operations to detect presence of recoverable oil.
- Deploy full offshore, nearshore, and onshore recovery operations and protect shorelines
- Continue wildlife recovery
- Continue in water monitoring activities including tar ball, nearshore and offshore submerged oil, and biological studies.
- Continue subsea monitoring in accordance with the subsea monitoring strategy.

ORGANIZATIONAL STRUCTURE

- All zone response operation at NIC, UAC, and ICPs
- Maintain parish branch directors.
- Maintain parish BP and USCG liaison officers.

❖ TRIGGER TO ENACT LEVEL II: No recoverable offshore oil

❖ METRICS:

- No observations of recoverable oil concentrations offshore, nearshore, subsurface and onshore for five consecutive days of full saturation observations.
- NOAA trajectories and models do not forecast any skimmable concentrations of offshore oil.
- No submerged oil plumes have been detected per established protocols.

❖ MEASURES:

- Reports from trained state and federal observers
- Daily Incident Awareness and Assessment (IAA) Summary
- Daily status map of NOAA aerial observation data (color coded) including number of total flights that created map and established submerged oil protocols.
- NOAA trajectory
- Satellite imagery of offshore oil (with short weather summary discussing potential impacts on image quality)

Level II: Nearshore and Shoreline Assessment and Cleanup

Status: No recoverable offshore zone (>3 miles) oil (on surface or submerged).

ACTIVITIES:

- Place offshore oil recovery operations in standby
- Continue SCAT Shoreline Assessment conducted under Stage I and II Nearshore and Shoreline Response Plan
- Deploy nearshore and onshore recovery operations as necessary
- Continue wildlife recovery
- Begin decontamination of offshore recovery vessels
- Redeploy offshore skimming equipment to nearshore where possible
- Recover nearshore floating or submerged oil and protect and clean shorelines
- Continue to assess deployment of nearshore and onshore resources
- Evaluate/implement appropriate boom or other protective measure strategies
- Commence in water monitoring activities including tar ball, nearshore submerged oil, and biological studies to support fisheries opening
- Continue subsea monitoring in accordance with the subsea monitoring strategy.

ORGANIZATIONAL STRUCTURE

- Scale branch staging areas appropriately in consultation with each respective Parish
- Scale ICPs & UAC appropriately
- Maintain parish branch directors
- Maintain parish BP and USCG liaison officers

❖ TRIGGER TO ENACT LEVEL III: No recoverable oil in water**.**

❖ METRICS:

- No aerial, vessel, or shoreline observations of skimmable concentrations of oil on 5 consecutive days of full saturation observations.
- NOAA trajectories and models do not forecast any skimmable concentrations of offshore or nearshore oil.
- No submerged oil plumes or pods have been detected or collected per established protocols.

❖ MEASURE: Areas of recoverable oil identified in nearshore or onshore impact

- Reports from trained state, federal, or local observers
- Daily IAA Summary
- Trend from Daily Status Map or any observation data Satellite imagery of nearshore oil (with short weather summary discussing potential impacts on image quality)
- Oil impact for total shoreline is considered “light”

Level III: Detailed Cleanup to Achieve Completion

Status: No recoverable oil in the near shore environment. Re-mobilization of assets for episodic and intermittent oil recovery. No substantial re-oiling of shorelines.

ACTIVITIES:

- Decontaminate recovery vessels not in use
- Conduct periodic overflights to check progress of cleanup
- Continue wildlife recovery
- Continue execution of Boom Strategy
- Re-baseline SCAT under Stage III Near Shore and Shoreline Response Plan
- Deploy Onshore recovery operations to implement SCAT Shoreline Treatment Recommendations (STRs)
- Address intermittent nearshore re-oiling as required
- Continue in water and shoreline monitoring
- Continue subsea monitoring in accordance with the subsea monitoring strategy.

ORGANIZATIONAL STRUCTURE

- Rescale organization based on termination of on-water recovery operations
- Maintain parish branch directors
- Maintain parish BP and USCG liaison officers

❖ TRIGGER TO ENACT LEVEL IV: All STRs have been completed such that further treatment would not provide net environmental benefit (NEB)

❖ METRICS:

- No retrievable visible or submerged oil
- No sheen releasing that will affect sensitive areas, wildlife, or human health.

❖ MEASURE:

- Percentage of shoreline miles signed off to be determined by federal, state and local authorities.
- Percentage of shoreline miles with no further treatment (NFT) recommended.
- Miles of shoreline signed off and miles of shoreline with NFT recommended.
- Trend of percentage of oil impact for total shoreline (Heavy, Medium, Light, No oil.)

Level IV: Maintenance and Monitoring

Status: Clean-up methods fully implemented. Habitat-based clean-up end points met and signed off. Remaining shoreline segments designated as NFT in Level III move to Level IV. Episodic impacts and discovery of oil continues.

ACTIVITIES:

- Review all oil recovery resources
- Natural attenuation of remaining oil
- Conduct routine monitoring
- SCAT surveys based on triggers relative to beach/shoreline profile (e.g. storm events)
- Assess equipment needed based on operational needs
- Develop and implement new STRs as determined through SCAT surveys
- Deploy hot-shot teams to address episodic impacts and discovery of oil along shorelines or in near shoreline environment
- Establish standard communication protocol with all effected parishes
- Detailed SCAT survey of impacted shoreline segments
- Signoff of shoreline segments where cleanup is complete
- STRs developed as appropriate for remaining shoreline segments
- Develop long-term monitoring and restoration plan for remaining shoreline segments which cannot be signed off.
- Deploy hot-shot teams to address episodic impacts and discovery of oil along shorelines or in near shoreline environment

ORGANIZATIONAL STRUCTURE

- Response framework returns to pre-existing National Response System (NRS) structure where coordination of the response is at the Coast Guard Sector/FOSC level.
- Maintain state liaison officer

- TRIGGER TO ENACT LEVEL V: Completion of winter storm season (Spring 2011)

- <u>METRICS:</u> To be determined.

- <u>MEASURE:</u>

  - Period for NFT segment re-evaluation
  - Percentage of miles of shoreline signed off
  - Number of monitoring and restoration projects identified for Level V
  - Parish rescinding of Declarations of Emergency

Level V: End State Status: Long-term Monitoring and Restoration

Status: Restoration complete. Episodic impacts and discovery of oil continues.

ACTIVITIES:

- On-going monitoring
- Deploy hot-shot teams to address episodic impacts and discovery of oil along shorelines or in near shoreline environment

Referenced or Associated Plans: (To be Developed and Communicated Separately)

a. Near Shore and Shoreline Stage I and II Response Plan; Mobile Sector: Approved May 8,2010
b. Near Shore and Shoreline Stage I and II Response Plan; Louisiana Division Sector: Approved May 6,2010
c. Decontamination Plan
d. Boom Strategy Plan
e. Severe Weather Plan
f. Near Shore and Shoreline Stage III Response Plan: *To be developed*
g. Parish Severe Weather Plans
h. Parish Boom Plans

Annexes: (To be Developed and Communicated Separately)

I. UAC Logistics Section Transition Plan
II. UAC External Affairs Transition Plan
III. Aircraft Coordination Command

ADDITIONAL ITEMS FOR CONSIDERATION

1. Need details on the determination of when a shoreline is to be classified as “no further treatment.”

2. Detailed monitoring plan:
    a. What long term monitoring will be conducted
    b. The frequency of the monitoring
    c. Who will conduct the monitoring
    d. A map of the sampling points
    e. The sampling method
    f. The parameters of the sampling and tests
    g. Access to the test results
    h. The term of the monitoring period

3. Information must be provided on the “hot shot” response plans, where the teams will be located, the required response item, the response trigger mechanisms, and the POC for response team activation.